

Message

From: Friesenhahn, Brody [friesenhahn.brody@epa.gov]
Sent: 9/9/2021 9:39:07 PM
To: Watson, Kelly R [kelly_watson@oxy.com]
CC: Ussery, Ian [Ussery.Ian@epa.gov]; Johnson, Ken-E [Johnson.Ken-E@epa.gov]; Yun, Samuel [Yun.Samuel@epa.gov]
Subject: RE: Letter Clarifications - Missing Modules & Crosswalks for Class VI Permit
Attachments: Cons_Submitters.zip

Good Afternoon Kelly,

Thank you for such a timely response! I'm looping in the other Class VI leads so that we can all be on the same page.

Yes! It is best to the modules with a clear indication that they are not a part of the project plan. That way we don't have to worry that certain parts of the application were just forgotten.

When it comes to the "draft" items, I apologize for the misleading name. We did that to try and make the fact that these documents will continually be updated for increased efficiency and ease of use clear to our applicants... but it has been a bit confusing for lots of folks.

I will include the most updated version of all of the documents that were provided by Sam Yun at the start of this whole process.

Please don't hesitate to reach out if there are any issues!

All the best,

Brody

From: Watson, Kelly R <Kelly_Watson@oxy.com>
Sent: Wednesday, September 8, 2021 1:36 PM
To: Friesenhahn, Brody <friesenhahn.brody@epa.gov>
Subject: Letter Clarifications - Missing Modules & Crosswalks for Class VI Permit

Brody,

I received your letter through the GSDT system.

On the subject of the missing modules – I did find on Page 24 of the UIC Program Class VI Well Recordkeeping, Reporting, and Data Management Guidance for Owners and Operators a table that indicates modules to be used for each phase. In addition to modules submitted, we should have submitted the Pre-Operational Testing Module. Since we are not seeking Alternative PISC Timeframe or Injection Depth Waivers, we did not submit those modules. Do we need to submit those two modules with notes in the text boxes to indicate waivers and alternatives are not part of the project plan?

For the crosswalks – I have only draft versions of the crosswalks for the 9 main modules and the Geoscience Narrative. The file names (as listed below) indicate the documents were updated in May and June of 2021. Can you confirm that the listing below are the versions to be used for creating crosswalks for Class VI permit documentation or direct me to a web location where a live version is available? I did search the EPA website, but I was unable to find these documents.

1. R6 Project Information Crosswalk – Draft 20210608v2

2. R6 AoR Corrective Action Plan Crosswalk – Draft 20210608
3. R6 Financial Responsibility Demonstration Crosswalk-draft_2021_05_14
4. R6 Pre-Operational Testing Crosswalk-draft_2021_05_14
5. R6 Project Plan Submissions Crosswalk-draft 05_14_2021
6. R6 Alternative PISC Timeframe Demonstration Crosswalk-draft 20210514
7. R6 Non-Endangerment Demonstration Crosswalk-draft_2021_05_14
8. R6 Injection and Post-Injection Phase Reporting Crosswalk-draft_2021_05_14
9. R6 Injection Depth Waivers and Aquifer Exempt Expansions Crosswalk-draft_2021_05_17
- R6_CrosswalkGeoscienceNarrative_Draft_20210504

As for the other points of the letter, the team will be working to resolve those issues.

Thank you for your time,

Kelly Watson, P.E.
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